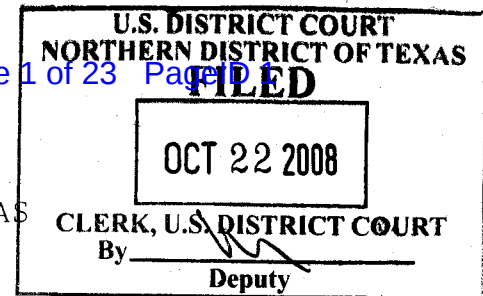


ORIGINAL

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



RONALD C. PEARSON,
Plaintiff

v.

- 1) US Department of Homeland Security,
- 2) Federal Bureau of Investigation
- 3) US Attorney, Northern District of Texas
- 4) Dept. of Justice Criminal Division

3-08 CV 1885-B

Civil Case No. _____

Complaint under the Freedom and Privacy Act and Request for Production of Documents

5 USC 552 and 5 USC 552(a)

COMPLAINT

Comes now Ronald C. Pearson, pro se, and states the following as his cause of action:

JURISDICTIONAL STATEMENT

1) This cause of action arises under the provisions of the Freedom of Information and Privacy Acts 5 USC 552 (a); further, this Court has jurisdiction and venue in this matter by virtue of the provisions of 5 USC 552 (a)(4)(b).

COUNT I

1) Plaintiff was sentenced upon Crim. Case No. 3:06-CR-369-R in this United States District Court, Northern District of Texas, on December 20, 2007, and presently resides in Seagoville, Texas at the Seagoville Federal Correctional Institution;

2) The Department of Homeland Security, Federal Bureau of Investigation, US Attorney's Office for the Northern District of

Texas, and Department of Justice - Criminal Division are departments of the executive branch of the United States Government which has among its constituent agencies the Department of Homeland Security, the F.B.I., US Attorney's Office, and Department of Justice - Criminal Division, herein named as defendants;

3) The Department of Homeland Security, the F.B.I., US Attorney, and Department of Justice - Criminal Division are agencies within the meaning of the term "agency" as that term is used in the Freedom of Information and Privacy Act;

4) The Department of Homeland Security, the F.B.I., US Attorney, and Department of Justice - Criminal Division prepare and maintain a system of records pertaining to investigation of defendants who are subject to the jurisdiction of the United States District Courts which includes the Northern District of Texas, Dallas Division;

5) That between June 3, 2008 and Aug. 13, 2008, the Plaintiff made requests in writing for copies of documents and records within the systems of records maintained by the Department of Homeland Security, the F.B.I., the US Attorney's Office, and the Department of Justice - Criminal Division as to Ronald C. Pearson, which documents and records may have been created and compiled during the years 2005 through and including 2008;

6) Specifically, Plaintiff requested that he be furnished within 10 days as provided by law [5 USC § 552(a)(6)(A)], copies of the following specified documents or information: For the years 2005 through and including 2008, all documents, records, reports, and communications naming or concerning Ronald C. Pearson;

7) Further, the request is not limited to the above. It includes all documents, reports, pictures, exhibits, memorandums, letters, summaries, handwritten notes, recordings, and all other information concerning this subject which is contained in their offices under the supervision and administration of the above-stated agency or branch of government;

8) The request was made pursuant to the provisions of the Freedom of information and Privacy Acts, Title 5 USC §§ 552, 552(a);

9) Defendants have failed, refused, and neglected to comply with Plaintiff's reasonable requests for records, documents, and discovery;

10) On or about Oct. 1, 2008 Plaintiff elected to treat the failure of defendants to produce, respond, and comply with Plaintiff's requests as denial of his requests;

11) Plaintiff brings this civil action for the purpose of compelling the defendants to disclose to the plaintiff his entire record of investigation for the years 2005 through and including 2008 as maintained within the system of records maintained by all named defendants; further, that the requested documents were specified and listed in plaintiff's FOIA/PA requests, which were mailed to the defendants on June 3, 2008 and on or about Aug. 13, 2008;

12) The said FOIA requests are in reference to federal criminal case number 3:06-CR-369-R and any and all other federal, state, and local investigations to which the defendants have knowledge;

COUNT II

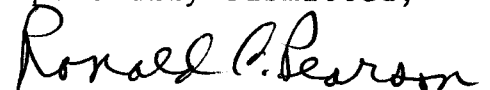
Comes now plaintiff Ronald C. Pearson pro se, in the above cause and moves the court to enter and order granting request for production of the following documents for the years 2005 through and including 2008, to-wit:

- a) All F.B.I. 302 reports concerning Ronald C. Pearson;
- b) All communication by the US Attorney's Office concerning Ronald C. Pearson;
- c) All in-house agency written reports, documents, records, hand-written notes naming Ronald C. Pearson or concerning Ronald C. Pearson collected and/or retained by the named federal agencies;
- d) All other relevant documents concerning the investigation of Ronald C. Pearson.

WHEREFORE, as to Count I and II, the plaintiff prays for an order to issue from the Court directing each of the defendants to each disclose to the plaintiff all above requested records which name or concern Ronald C. Pearson between the years 2005 and 2008.

Further, because the filing of this action could have been avoided by defendants' timely production of the documents sought by Plaintiff, Plaintiff moves this Court to direct defendants to pay the costs of this action, and for such other relief as the Court deems just in the premises.

Respectfully submitted,



Ronald C. Pearson
Reg. No. 36037-177
Federal Correctional Inst.
PO Box 9000
Seagoville, TX 75159-9000

ATTESTATION

United States District Court)
For the Northern District of Texas) ss:
Dallas Division)

Comes now Ronald C. Pearson, pro se in the above entitled cause of action, and upon his oath does depose and state that the allegations in the foregoing complaint are true and correct according to his best knowledge, information, and belief, and that he does so state under the pains and penalties of perjury under 28 USC 1746.

A handwritten signature in cursive script that reads "Ronald C. Pearson". The signature is written in dark ink and is positioned above a horizontal line.

Ronald C. Pearson

U.S. Department of Homeland Security
Office of Investigation
125 E. John Carpenter Fwy, Ste. 800
Irving, Texas 75062



**Homeland
Security**

June 18, 2008

Ronald C. Pearson
36037-177
F.C. I.
P.O. Box 9000
Seagoville, Tx 75159

Re: FOIA Request

Dear Mr. Pearson:

This acknowledges receipt of your, Freedom of Information Act (FOIA) request to the Department of Homeland Security (DHS), for Immigration and Customs Enforcement/Special Agent in Charge, Dallas office. Your request was received in this office on June 12, 2008, because of the missing zip code for this office.

I am forwarding you an affirmation/declaration statement, which is needed in order to process your FOIA request. Please fill out the affirmation/declaration statement and return to the address listed on the bottom of the Affirmation/Declaration statement.

I will process your FOIA request as soon as this statement is received, but due to the increasing number of FOIA requests received by this office, we may encounter some delay in processing your request. Per Section 5.5(a) of the DHS FOIA regulations, 6 C.F.R. Part 5, the Department processes FOIA requests according to their order of receipt. Although DHS' goal is to respond within 20 business days of receipt of your request, the FOIA does permit a 10-day extension of this time period. As your request seeks numerous documents that will necessitate a thorough and wide-ranging search, DHS will invoke a 10-day extension for your request, as allowed by Title 5 U.S.C. § 552(a)(6)(B). If you care to narrow the scope of your request, please contact our office. We will make every effort to comply with your request in a timely manner.

FOIA Coordinator
Special Agent in Charge/Dallas Office

U.S. Department of Homeland Security
Office of Investigation
125 E. John Carpenter Fwy, Ste. 800
Irving, Texas 75062



Homeland Security

AUG 18 2008

Ronald C. Pearson
Reg. No. 36037-177
F.C.I. Seagoville
P.O. Box 9000
Seagoville, TX 75159-9000

Re: FOIA 2008 – Ronald C. Pearson

Dear Mr. Ronald C. Pearson:

This is the response to your Freedom of Information Act (FOIA) request to the Department of Homeland Security (DHS), dated August 13, 2008, and received by this office of August 18, 2008. You are seeking copies of all documents pertaining to yourself.

On June 18, 2008, I sent a letter requesting an affirmation/declaration statement from you. On August 18, 2008, I received a second letter from you along with an unsigned copy of the original request for the affirmation/declaration statement which I previously sent to you. As of this date, I have not received a signed copy of the requested document. However, I have decided to process your FOIA request.

A search of the investigations record system of the Office of the Special Agent in Charge, Dallas, Texas for documents responsive to your request has determined that records are being withheld in their entirety pursuant to Title 5 U.S.C. § 552 FOIA Exemptions (b)(7)(a).

FOIA Exemption 7(A) protects from disclosure records or information compiled for law enforcement purposes, the release of which could reasonably be expected to interfere with enforcement proceedings. I have determined that the information you are seeking relates to an ongoing criminal law enforcement investigation. Therefore, I am withholding all records, documents, and/or other material, which if disclosed prior to completion, could reasonably be expected to interfere with law enforcement proceedings and final agency actions related to those proceedings. Please be advised that once all pending matters are resolved and FOIA Exemption 7(A) is no longer applicable, there may be other exemptions which could protect certain information from disclosure, such as FOIA Exemptions (2), 7(C), 7(D), and 7(E).

FOIA Exemption 2(high) protects information applicable to internal administrative and personnel matters, such as operating rules, guidelines, and manual of procedures of examiners or adjudicators, to the extent that disclosure would risk circumvention of an agency regulation or statute, impede the effectiveness of an agency's activities, or reveal sensitive information that may put the security and safety of an agency activity or employee at risk. Whether there is any public interest in disclosure is legally irrelevant. Rather, the concern under high 2 is that a FOIA disclosure should not benefit those attempting to violate the law and avoid detection.

FOIA Exemption 2(low) protects information applicable to internal administrative personnel matters to the extent that the information is of a relatively trivial nature and there is no public interest in the document.

Exemption 7(C) protects records or information compiled for law enforcement purposes that could reasonably be expected to constitute an unwarranted invasion of personal privacy. This exemption takes particular note of the strong interests of individuals, whether they are suspects, witnesses, or investigators, in not being unwarrantably associated with alleged criminal activity. That interest extends to persons who are not only the subjects of the investigation, but those who may have their privacy invaded by having their identities and information about them revealed in connection with an investigation. Based upon the traditional recognition of strong privacy interest in law enforcement records, categorical withholding of information that identifies third parties in law enforcement records is ordinarily appropriate. As such, I have determined that the privacy interest in the identities of individuals in the records you have requested clearly outweigh any minimal public interest in disclosure of the information. Please note that any private interest you may have in that information does not factor into this determination.

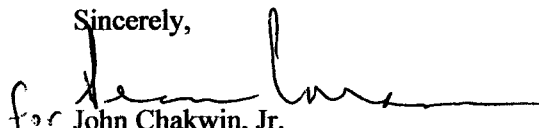
Exemption 7(D) pertains to records or information compiled for law enforcement purposes, the release of which could reasonably be expected to disclose the identities of confidential sources. *[The types of documents and/or information that we have withheld could consist of names, addresses, telephone numbers, institutions, source symbol numbers, or source provided information, such as testimony, statements, reports, investigations, audio/video tapes, or various other documents or information withheld to protect the identity of a confidential source.]*

Exemption 7(E) protects records compiled for law enforcement purposes, the release of which would disclose techniques and/or procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law.

You have a right to appeal the above withholding determination. Should you wish to do so, you must send your appeal and a copy of this letter, within 60 days of the date of this letter, to: Associate General Counsel (General Law), U.S. Department of Homeland Security, Washington, D.C. 20528, following the procedures outlined in the DHS regulations at 6 C.F.R. § 5.9. Your envelope and letter should be marked "FOIA Appeal." Copies of the FOIA and DHS regulations are available at www.dhs.gov/foia.

If you need to contact our office again about this matter, please contact SAC Dallas FOIA Coordinator and reference FOIA 2008-Ronald C. Pearson. This office can be reached at 972-444-7300.

Sincerely,


for John Chakwin, Jr.
Special Agent in Charge
Dallas, Texas



Federal Bureau of Investigation

Washington, D.C. 20535

June 17, 2008

Ronald C. Pearson
**36037-177
Federal Correction Institution
Post Office Box 9000
Seagoville, TX 75159

Dear Mr. Pearson:

Your Freedom of Information-Privacy Acts (FOIPA) request is being returned. Your letter did not contain sufficient information to conduct an accurate search of the central records system at FBI Headquarters. The following information is necessary:

Full Name: Ronald Cameron Pearson
Current Address: #36037-177, FCI, P.O. Box 9000, Seagoville, TX 75159-9000
Date of Birth: May 9, 1947 Place of Birth: FT. Worth, TX
Daytime Telephone Number: Can be reached through my Power of Attorney, Rex Smith 214-674-0036

You may also wish to provide prior addresses, employments, aliases, etc., which you believe may assist the FBI in locating the information you seek. My home address (currently being leased)

is → 1132 Rock Creek Drive, Garland, TX 75040

Under penalty of perjury, I hereby declare that I am the person named above and I understand that any falsification of this statement is punishable under the provisions of Title 18, United States Code (U.S.C.), Section 1001 by a fine of not more than \$10,000 or by imprisonment of not more than five years, or both; and that requesting or obtaining any record(s) under false pretenses is punishable under the provisions of Title 5, U.S.C., Section 552a(i)(3) as a misdemeanor and by a fine of not more than \$5,000. All signatures under the penalty of perjury statement must be original and legible, as the FBI is no longer accepting faxed signatures.

Signature Ronald C. Pearson Date June 23, 2008

To initiate your FOIPA request, please return the original request letter with the requested information. Please note that mail addressed to the FBI is delayed several weeks due to increased security procedures now in place. **You must mail your request with your original, legible signature.**

Sincerely yours,

David M. Hardy /mew

David M. Hardy
Section Chief
Record/Information
Dissemination Section
Records Management Division



U.S. Department of Justice

Federal Bureau of Investigation

Washington, D.C. 20535

September 10, 2008

MR. RONALD CAMERON PEARSON
**36037-177
FEDERAL CORRECTIONAL INSTITUTION
POST OFFICE BOX 9000
SEAGOVILLE, TX 75159 9000

Request No.: 1119381- 000
Subject: PEARSON, RONALD CAMERON

Dear Mr. Pearson:

- ☒ This acknowledges receipt of your Freedom of Information-Privacy Acts (FOIPA) request to the FBI. The FOIPA number listed above has been assigned to your request.
- ☐ For an accurate search of our records, please provide the complete name, alias, date and place of birth for the subject of your request. Any other specific data you could provide such as prior addresses, or employment information would also be helpful. If your subject is deceased, please include date and proof of death.
- ☐ To make sure information about you is not released to someone else, we require your notarized signature or, in place of a notarized signature, a declaration pursuant to Title 28, United States Code 1746. For your convenience, the reverse side of this letter contains a form which may be used for this purpose.
- ☐ If you want the FBI's Criminal Justice Information System (CJIS) to perform a search for your arrest record; please follow the enclosed instructions in Attorney General Order 556-73. You must submit fingerprint impressions so a comparison can be made with the records kept by CJIS. This is to make sure your information is not released to an unauthorized person.
- ☒ We are searching the indices to our central records system at FBI Headquarters for the information you requested; and will inform you of the results as soon as possible.
- ☐ Processing delays have been caused by the large number of requests received by the FOIPA. We will process your request(s) as soon as possible.

Your request has been assigned the number indicated above. Please use this number in all correspondence with us. Your patience is appreciated.

Sincerely yours,

A handwritten signature in black ink, appearing to read "D Hardy", is written over the typed name.

David M. Hardy
Section Chief,
Record/Information
Dissemination Section
Records Management Division



United States Attorney
Northern District of Texas

801 Cherry Street, Suite 1700
Fort Worth, Texas 76102-6897

Telephone (817)252-5200
Fax (817)978-3094

August 18, 2008

Mr. Ronald C. Pearson
Reg. No. 36037-177
FCI Seagoville
P.O. Box 9000
Seagoville, TX 75159-9000

Re: Freedom of Information & Privacy Act of 1974 Request

Dear Mr. Pearson:

I am in receipt of your letter dated August 13, 2008. Pursuant to the provisions of Part 16, Title 28 of the Code of Federal Regulations, I have forwarded your correspondence to the Freedom of Information Act Unit at the Department of Justice in Washington, D.C. You will be hearing from them directly.

Sincerely,

Linda G. Cook
Paralegal Specialist

cc: Executive Office for United States Attorneys
Freedom of Information/Privacy Act Unit



United States Attorney
Northern District of Texas

801 Cherry Street, Suite 1700
Fort Worth, Texas 76102-6897

Telephone (817)252-5200
Fax (817)978-3094

August 20, 2008


Mr. Ronald C. Pearson
Reg. No. 36037-177
FCI Seagoville
P.O. Box 9000
Seagoville, TX 75159-9000

Re: Freedom of Information & Privacy Act of 1974 Request

Dear Mr. Pearson:

I am in receipt of a second demand letter dated August 13, 2008, addressed to the U.S. Attorney's Office for the Northern District of Texas. As stated in my first response dated June 20, 2008, and my second response dated August 20, 2008, your inquiry was forwarded to the Freedom of Information Act Unit at the Department of Justice in Washington, D.C. I further advised that the Freedom of Information Act Unit at the Department of Justice in Washington, D.C. would contact you directly. Therefore, please direct all future inquiries to the appropriate unit in Washington, D.C.

Sincerely,


Linda G. Cook
Paralegal Specialist

cc: Executive Office for United States Attorneys
Freedom of Information/Privacy Act Unit



Executive Office for United States Attorneys
Freedom of Information & Privacy Staff
600 E Street, N.W., Suite 7300, Bicentennial Building
Washington, DC 20530-0001
(202) 616-6757 FAX: 616-6478 (www.usdoj.gov/usao)

Requester: Ronald PearsonRequest No.: 08-1923

JUL 28 2008

Subject: Self/TXN

The Executive Office for United States Attorneys (EOUSA) has received your Freedom of Information Act/Privacy Act (FOIA/PA) request. It has been assigned the above number. Please give us this number if you write about your request. If we need additional information, we will contact you within two weeks.

Your request will be placed in the order in which it was received for processing, unless it is a very large request (Project Request). Then, it will be placed in a separate group of Project Requests, which are also processed in the order received.

EOUSA makes every effort to process most requests within a month (20 working days). There are some exceptions; for example, Project Requests usually take approximately nine months to process. Requests for "all information about myself in criminal case files" are usually Project Requests. If you have made such a request, you may either write us and narrow your request for specific items, or you may expect that the processing of your request may take nine months from the date of this letter.

By making a FOIA/PA request, you have agreed to pay fees up to \$25, as stated in 28 CFR § 16.3(c), unless you have requested a fee waiver. Please note that pursuant to 28 CFR § 16.11, if you have not been granted a fee waiver, we are required to charge fees for time used to search for the documents you have requested and for duplication of all pages released to you. Normally, search time is charged at a rate of \$28 per hour after the first two hours which are free, and duplication fees are \$0.10 per page after the first 100 pages which are free. Please do not send any payment at this time! If we anticipate that fees will exceed \$25 or the amount you have stated in your letter (if greater than \$25), we will normally notify you of our estimate of fees. After we have received your agreement to pay for the expected fees (or you have narrowed your request to reduce fees) and we have processed your request, we will require payment for the accumulated charges before we release documents to you. Without such payment, your request file will be closed without further action.

If you wish to revise your request to try to reduce fees, you may use the attached form. If you do not wish to incur fees for your request as it is now stated, please submit this form (or your letter revising your request) to us within 15 days so that your request, and fees, can be limited.

Sincerely,

William G. Stewart II
Assistant Director

Requester: Ronald Pearson

Request Number: 08-1923

CHOOSE ONE

☐ I understand that I am entitled to the first 100 pages and 2 hours of search time free. Please search only up to 2 hours and process only up to 100 pages that can be released to me.

☐ I wish to withdraw my request.

☐ I wish to revise my request to try to reduce fees. Please limit my request to the following documents:

(Please note that a search for specific records may sometimes require more search time and fees).

☐ Please search only up to the following number of hours: _____

I understand that search payment will be required even if no documents are located or released to me. In the event that documents are located and released to me, I understand that I may be charged duplication fees in addition to search fees.

Name

Date

Please return to:

EOUSA
FOIA/PA
600 E. Street, N.W., Room 7300
Washington D.C., 20530



Washington, D.C. 20530

AUG 28 2008

Ronald C. Pearson
Reg. No. 36037-177
F.C.I. - Seagoville
P.O. Box 9000
Seagoville, TX 75159-9000

Dear Mr. Pearson:

This is in response to your request, Certified Mail Number 7003 2260 0005 2317 2260, dated June 18, 2008. Your Freedom of Information Act and/or Privacy Act (FOIA/PA) request was received by this office which serves as the receipt and referral unit for FOIA/PA requests addressed to the Department of Justice (DOJ). Federal agencies are required to respond to a FOIA request within 20 business days. This period does not begin until the request is actually received by the component within the DOJ that maintains the records sought.

We have referred your request to the DOJ component(s) you have designated or, based on descriptive information you have provided, to the component(s) most likely to have the records. The component(s) to which your request has been forwarded are indicated on the enclosed FOIA/PA Referral/Action Slip. All future inquiries concerning the status of your request should be addressed to the office(s) listed below:

FOIA/PA
Executive Office for U.S. Attorneys
Department of Justice
600 E Street, NW, Room 7300
Washington, DC 20530-0001
(202) 616-6757

Sincerely,

Ronald Deacon, Director
Facilities and Administrative
Services Staff
Justice Management Division

Enclosure
FOIA/PA Referral/Action Slip

PLEASE ADD THE
FBI to the Referral/Action
SLIP TENDERED WITH THIS
CORRESPONDENCE.
Ronald C. Pearson



U.S. Department of Justice

Criminal Division
Office of Enforcement Operations

(202) 616-0307

Washington, D.C. 20530

CRM- 200800392P

JUN 11 2008

Ronald Pearson
Reg. No. 36037-177
Federal Correctional Institution
P.O. Box 9000
Seagoville, TX 75159-9000

Dear Mr. Pearson:

This will acknowledge receipt of your letter of June 3, 2008, requesting records relating to you.

We are unable to search for the records you requested because you have not furnished the following item(s) in compliance with 28 C.F.R. 16.41.

☐ Certification of Identification Form. Notarized signature or Declaration pursuant to 28 U.S.C. Section 1746.

☒ Privacy Act Identification and Request Form. This form is requested because our experience indicates that many persons throughout the country have the same or similar names.

☒ CURRENT Descriptive List of Sections of the Criminal Division. Please review this list and indicate which sections you wished searched.

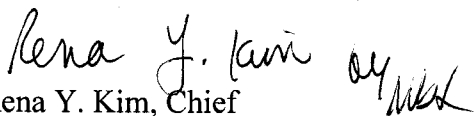
Copies of the requested form(s) are enclosed.

We are closing out this request. Upon receipt of the completed form(s), we will assign a new number to your request and process it. Please return the requested form(s) to Rena Y. Kim, Chief, FOIA/PA Unit, Criminal Division, Keeney Building, Suite 1127, Department of Justice, 950 Pennsylvania Avenue, N.W., Washington, D.C. 20530.

If you treat this response as a denial, you have a right to an administrative appeal. The appeal should be made in writing and should be addressed to: Director, Office of Information and Privacy, United States Department of Justice, 1425 New York Ave., NW, Suite 11050, Washington, DC 20530-0001. Both the envelope and the letter should be clearly marked with the legend "FOIA Appeal." Department regulations provide that such appeals must be received by the Office of Information and Privacy within sixty days of the date of this letter. 28 C.F.R. 16.45. If you exercise this right and your appeal is denied, you also have the right to seek judicial review of this action in the federal judicial district (1) in which you reside, (2) in which you have

your principal place of business, (3) in which the records denied are located, or (4) for the District of Columbia. If you elect to file an appeal, please include, in your letter to the Office of Information and Privacy, the Criminal Division file number that appears above your name in this letter.

Sincerely,


Rena Y. Kim, Chief
Freedom of Information/Privacy Act Unit



U.S. Department of Justice

Criminal Division

Washington, D.C. 20530

SEP 9 2008

CRM-200800606P

Mr. Ronald Pearson
Reg. No. 36037-177
Federal Correctional Institution
P.O. Box 9000
Seagoville, TX 75159-9000

Dear Mr. Pearson:

This will acknowledge receipt of your Privacy Act request dated June 18, 2008, for Criminal Division records concerning you. Your request has been assigned file number 200800606P. Please refer to this number in any future correspondence with this Unit.

We will search the appropriate records systems and will respond to you further after we complete our searches. If you have any questions regarding the status of this request, you may contact our office at 202-616-0307.

Sincerely,

Rena Y. Kim
ky. MBK

Rena Y. Kim, Chief
Office of Enforcement Operations

August 13, 2008

U.S. Department of Homeland Security
Office of Investigation
125 E. John Carpenter Fwy., Ste. 800
Irving, TX 75206

Ref: Second Request and Final Demand

Dear Sir or Ms:

I have previously properly requested FOIA materials in my case -- without timely production by your office. This communication will constitute written notice that, should your office not locate, copy and tender to me the requested FOIA records and documents within ten (10) business days, I will consider the failure to produce said documents to be a denial of my FOIA request and will sue in Federal Court to obtain the requested FOIA materials.

Sincerely,



Ronald C. Pearson
Reg. No. 36037-177
F.C.I. Seagoville
P.O. Box 9000
Seagoville, TX 75159-9000

August 12, 2008

David M. Hardy, Section Chief
Record/Information
Dissemination Section
Records Management Division
Federal Bureau of Investigation

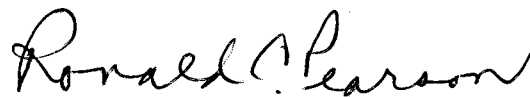
Ref: Second Request and Final Demand
Request No. 116549-000

Dear Mr. Hardy:

I have previously, properly requested FOIA materials concerning myself to no avail. In short, I am getting the run around. You instructed per July 16 correspondence (Exhibit A) that I contact the FBI field office because the national office doesn't have the documents. The previous day you in writing acknowledged my FOIA request to the Dallas Field office and stated that you had forwarded the request to FBI Headquarters.

This circular argument is not responsive to my request and does not comply with the law. You have 10 business days to locate, copy and mail to me my requested records. Failure to produce will be considered a denial of my FOIA request and will result in the filing in federal court of an action seeking release of the FOIA materials.

Sincerely,



Ronald C. Pearson
Reg. No. 36037-177
F.C.I. Seagoville
P.O. Box 9000
Seagoville, TX 75159-9000

August 13, 2008

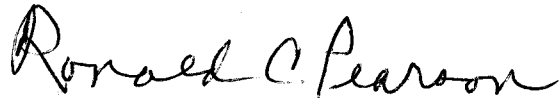
U.S. Attorneys Office
Earle Cabell Federal Bldg.
1100 Commerce St., 3rd Floor
Dallas, TX 75242

Ref: Second Request and Final Demand

Dear Sir or Ms:

I have previously properly requested FOIA materials in my case -- without timely production by your office. This communication will constitute written notice that, should your office not locate, copy and tender to me the requested FOIA records and documents within ten (10) business days, I will consider the failure to produce said documents to be a denial of my FOIA request and will sue in Federal Court to obtain the requested FOIA materials.

Sincerely,



Ronald C. Pearson
Reg. No. 36037-177
F.C.I. Seagoville
P.O. Box 9000
Seagoville, TX 75159-9000

October 13, 2008

Clerk, United States District Court
for the Northern District of Texas
Dallas Division
Earle Cabell Federal Building
1100 Commerce Street
Dallas, TX 75242

Reference: filing fees

Dear Clerk:

Enclosed you will find for filing the original and suitable copies of summons and complaints and service by the US Marshal's Office.

I am a federal inmate at FCI Seagoville, TX. I am also the plaintiff in the enclosed lawsuit. As such I cannot send a check directly from prison. Payment in full for the filing fee is being sent under separate cover. Please hold these pleadings in your office until the filing fee check is received and file the lawsuit on that date. Please advise any subsequent service fees incurred by the US Marshals in serving the various defendants and they will be promptly paid.

Thank you for your assistance in this important matter.

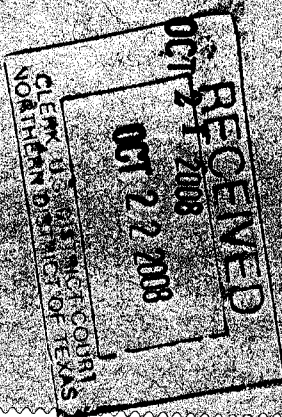
Respectfully submitted,

Ronald C. Pearson

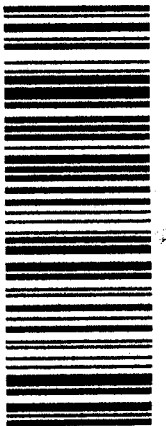
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